No. 16-1357

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

E.I. DU PONT DE NEMOURS AND COMPANY,
Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,
Respondent.

MOTION FOR LEAVE TO INTERVENE

Pursuant to Rule 15(d), F.R.A.P., the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("the Union") moves for leave to intervene. The Union was the charging party before the National Labor Relations Board in this case and is, therefore, a party entitled to intervene in the proceeding to review the Board's decision. *See Automobile Workers v. Scofield*, 382 U.S. 205 (1965).

Respectfully Submitted,

/s/ Matthew J. Ginsburg
Matthew J. Ginsburg
James B. Coppess
815 Sixteenth Street, NW
Washington, DC 20006
(202) 637-5397
mginsburg@aflcio.org

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2016, copies of the foregoing Motion For Leave to Intervene were served on the following counsel of record through the CM/ECF system if they are registered users or, if they are not, by serving a true and correct copy at the addresses listed below:

Thomas Peter Gies
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004-2595
tgies@crowell.com

Linda Dreeben
National Labor Relations Board
Appellate and Supreme Court Litigation Branch
1015 Half Street SE, Suite 8100
Washington, DC 20570
appellatecourt@nlrb.gov

/s/ Matthew J. Ginsburg
Matthew J. Ginsburg